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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 HUGO BARRAGAN,

11 Plaintiff,

12 vs.

13 EARLY WARNING SERVICES, LLC, THE
14 RETAIL EQUATION, and
BACKGROUNDCHECKS.COM,

15 Defendants.

Case No.: 2:20-cv-00795-KJD-VCF

Compl. Filed: May 4, 2020

**STIPULATION TO EXTEND
DEFENDANT THE RETAIL
EQUATION'S TIME TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

16
17 This Stipulation to Extend Defendant The Retail Equation's Time to Respond to
18 Complaint is made by and between Plaintiff Hugo Barragan ("Plaintiff") and Defendant
19 The Retail Equation ("TRE") through their respective counsel, in light of the following
20 facts:

21 RECITALS

22 A. Plaintiff filed the Complaint ("Complaint") against TRE on or about May
23 4, 2020.

24 B. TRE was served with the Complaint on or about May 6, 2020.

25 C. TRE's current deadline to respond to the Complaint was May 27, 2020,

26 D. The parties agreed that TRE would have through June 15, 2020, to respond
27 to the Complaint in order to give TRE time to investigate Plaintiff's claims and prepare a
28 proper response, and for the parties to discuss a potential resolution of this matter.

E. There is good cause to grant this stipulation because TRE requires additional time to investigate Plaintiff's claims and prepare a proper response, and the parties require additional time to consider a resolution of this matter.

F. This stipulation is filed in good faith and not intended to cause delay.

G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and TRE respectfully request that the Court extend TRE's time to respond to Plaintiff's Complaint through June 15, 2020.

STIPULATION

NOW, THEREFORE, Plaintiff and TRE hereby stipulate and agree that TRE has up to and including June 15, 2020, to file a response to Plaintiff's Complaint.

IT IS SO STIPULATED.

DATED this 2nd day of June, 2020.

KRIEGER LAW GROUP, LLC

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DATED this 2nd day of June, 2020.

**LEWIS ROCA ROTHGERBER
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Attorneys for Defendant
The Retail Equation, Inc.

ORDER

IT IS SO ORDERED



United States Magistrate Judge

DATED 6-2-2020